

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

UNITED STATES OF AMERICA,

Case No. 1:21-CR-286

v.

Judge Anthony J. Trenga

**WILLIAM F. SNOW,
Defendant**

Trial Date: November 14, 2022

**DEFENDANT’S MOTION FOR INTERNET ACCESS DURING THE COURSE OF
TRIAL**

COMES NOW Gretchen L. Taylor, counsel for William F. Snow, and moves this Honorable Court to allow her and her co-counsel to make use of a cellphone hotspot, Mi-Fi, or other means to access the internet during the trial, as needed. In support of her Motion, counsel states as follows:

1. This matter is currently scheduled for a jury trial to begin on November 14, 2022. This case is a paper intensive white-collar fraud and bribery case, which is expected to take approximately seven (7) trial days.
2. The vast majority of discovery in this case is located on a cloud-based platform, Casepoint, which was provided by Defender Services. The platform’s potential exhibits for this case comprise approximately 212,242 documents turned over in discovery by the Government. It would be impractical to download or access the entirety of discovery without internet.

3. Access to the Casepoint cloud-based database would allow the Defense to view documents as they come up at trial. In particular, access to discovery is important for documents the government may use to rebut the Defense's case-in-chief through their cross of our witnesses, which would not be disclosed prior to trial.
4. Also, the Defense would like to be able to utilize the JuryBox app during voir dire, this app allows the Defense to take juror specific notes and organize jurors in a cloud-based app that updates in real time and is viewable to multiple members of the legal team.
5. Additionally, access to the Internet would allow counsel to access case law as issues arise during the multi-day trial.

WHEREFORE, Defendant respectfully prays that this Court order that defense counsel be permitted to access the internet via cellphone hotspot, mi-fi, or other means allowed by the Court in the Courtroom for the duration of the trial. A separate request for authorization to bring 2 laptops and 1 iPad and a cellphone or other hotspot device into the courthouse will be submitted.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I certify that on October 28, 2022, I will electronically file the foregoing pleading with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to all counsel of record including:

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/s/
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